

PLAINTIFFS' MORE DEFINITE STATEMENT AS TO DEFENDANTS DAR AL MAAL AL ISLAMI A/K/A DAR-AL-MALL AL ISLAMI A/K/A DAR AL-MAAL AL-ISLAMI (DMI) REFERRING TO AND INCLUDING DAR AL MAAL ADMINISTRATIVE SERVICES SA A/K/A DMI ADMINISTRATIVE SERVICES SA AND DAR AL MAAL AL ISLAMI TRUST ("DMI TRUST") (HEREIN AFTER COLLECTIVELY KNOWN AS "DMI").

Plaintiffs hereby incorporate all allegations and counts contained in the Second Amended Complaint in *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al.* (1:04-cv-7065). The following is asserted upon information and belief.

1. From the mid-1990s up to and including September 11, 2001, DMI aided and abetted and conspired to support terrorism and to obfuscate the roles of the various participants and conspirators in Al Qaeda, which conspiracy culminated in the September 11, 2001 attack.
2. DMI undertook the above named actions as part of a conspiracy to commit murder and arson, in that they knew that Al Qaeda, planned to and would commit an act of deadly aggression against the United States, its citizens and property, in the near future, using the resources and support supplied by DMI.
3. Al Qaeda, as alleged in the Second Amended Complaint, relied upon funds and material support provided by others, including DMI. Indeed, after being turned out of the Sudan in May 1996, Al Qaeda established itself in Afghanistan, and relied on well-placed financial facilitators, including DMI, who laundered funds from Islamic so-called charities and corporations and raised money from witting and unwitting donors. The funds thus provided were used, among other things, to operate terrorist training camps in Afghanistan, where recruits were trained in conventional warfare but where the best and most zealous recruits received terrorist training. The curriculum in the camps placed with great emphasis on ideological and religious indoctrination. All trainees and other personnel were encouraged to think creatively about ways to commit mass murder. The camps were able to operate only because of the worldwide network of recruiters, travel facilitators, and document forgers who vetted recruits and helped them get in and out of Afghanistan. From the ranks of these recruits the nineteen perpetrators of the September 11, 2001 attack were selected. None of this would have been possible without the funds supplied by participants and conspirators like DMI.
4. Al Qaeda would not have been successful without enthusiastic participation of all of the conspirators, including DMI. In order to identify nineteen individuals willing, able and competent to carry out the September 11, 2001 attack, Al Qaeda needed to select from a vast pool of recruits and trainees, which pool would not have been available to it without the assistance provided by DMI. DMI, with knowledge and intent, agreed to the overall objectives of the conspiracy, and agreed to commit at least two predicate acts and all agreed to participate in the conspiracy, either expressly or impliedly.

5. DMI has long provided financial services and other forms of material support to Al Qaeda. DMI has an investment banking arm known as the Islamic Investment Company of the Gulf ("IICG"), which is based in Bahrain. IICG is a wholly-owned subsidiary of DMI. Faisal Islamic Bank is a subsidiary of IICG. Both DMI and Faisal Islamic Bank are major shareholders in Al Shamal Bank.

6. A director of the Al Shamal Bank is Haydar Bin Laden, the half brother of Osama Bin Laden. Haydar Bin Laden is also on the Board of Directors for DMI. The United Nations has acknowledged that DMI funds were diverted to terrorist activities.

7. DMI has been directly linked to holding funds for Al Qaeda through several of its subsidiary banks, including Al Shamal Bank. Based upon information and belief, Al Shamal Bank reportedly held upwards of \$50 million of investments of Osama Bin Laden, according to state department and United Nations documents.

8. DMI has also been linked to Al Taqwa Bank. The United States and the United Nations sanctioned Al Taqwa for funding Al Qaeda and other terrorist activities.

9. DMI is viewed in the Muslim world as one of the primary vehicles for Saudi financing of the International Islamic Fundamentalist Movement. During the 2001 trial, relating to the 1998 United States embassy bombings in Kenya and Tanzania, Faisal Islamic Bank, which is a subsidiary of DMI, was implicated as holding bank accounts for Al Qaeda operatives. DMI adheres to the *Zakat* system of donating 2.5% of a company's annual income to Islamic leaders and institutions. DMI's *Zakat* accounts have been used to support Al Qaeda.

10. In doing all of the above, DMI knowingly provided financial services and other forms of material support to Al Qaeda. DMI provided critical financial and logistical support Al Qaeda. The September 11, 2001 attack was a direct, intended and foreseeable product of DMI's conduct.